

# Exhibit B

## Allan T Motzny

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**From:** Marshak, Abigail (CRT) <Abigail.Marshak@usdoj.gov>  
**Sent:** Monday, August 1, 2022 2:06 PM  
**To:** Lisa\_Bartlett@mied.uscourts.gov  
**Cc:** DeClercq, Susan (USAMIE); Raimondo, Katie (CRT); Ackenhausen, Shannon (USAMIE); Amy Doukoure; Allan T Motzny; Lori G Bluhm  
**Subject:** Update Related to Motion to Amend/Correct in 2:19-cv-12736-NGE-APP United States of America v. City of Troy

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Dear Ms. Bartlett:

I am writing with an update related to the Motion to Amend/Correct in 2:19-cv-12736-NGE-APP *United States of America v. City of Troy*. As you know, the parties participated in a series of settlement conferences before Judge Grand, with the final conference held on July 21. Though the parties made progress that impacts the United States' Motion to Amend, the parties ultimately reached an impasse and no future settlement discussions are scheduled.

Specifically, based on the mediated discussions, Troy issued Adam Community Center a Certificate of Occupancy. The United States' requests related to Troy allowing Adam Community Center to use the property are therefore moot.

The parties did not make similar progress in settlement discussions related to the unenforceable Zoning Ordinance provisions that are still on Troy's website. By advertising to the community that they are an active part of its Zoning Ordinance, Troy is, in effect, still enforcing these posted provisions. Accordingly, the United States still seeks relief related to Troy's equal terms violations.

Please let us know if the Court would like additional information or would like to meet with the parties to discuss the pending motion.

Thank you.

**Abigail Marshak** | Trial Attorney

U.S. Department of Justice | Civil Rights Division | Housing and Civil Enforcement Section

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Pronouns: she/her/hers ([What's this?](#))